

February 4, 2009

603 N. Adams St. Carroll, IA 51401

Phone: 712.775.2946

888.508.2946

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**FCC Mail Room** 

To: Marlene H. Dortch

Office of the Secretary

Federal Communications Commission

445 12th Street, SW Suite TW-A325

Washington, DC 20554

Federal Communications Commission

Enforcement Bureau

**Telecommunications Consumers Division** 

445 12th Street, SW

Washington, DC 20554

Best Copy and Printing, Inc.

445 12th Street

Suite CY-B402

Washington, DC 20554

(Two copies)

(One copy)

In re: Annual 47 C.F.R. 64.2009(e) CPNI Certification

EB Docket No. 06-36

Attached please see the above-referenced certification for BTC, Inc. for 2008.

Sincerely,

BTC, INC.

Megan Badding

Marketing/Sales/CS Manager

**Enclosures** 

No. of Copies rec'd\_ List ABCDE

#### Annual 47 C.F.R. § 64.2009(e) CPNI Certification

#### EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008.

Date filed: February 4, 2009

Name of company covered by this certification: BTC, Inc.

Form 499 Filer ID: 821922

Name of signatory: Megan Badding

Title of signatory: CSR/Sales/Marketing Manager

I, Megan Badding, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules. <u>See attached accompanying statement of operating procedures.</u>

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The company currently has no information with respect to the processes pretexters are using to attempt to access CPNI. At this time, we have not encountered known pretexting. Our protective measures against pretexters are outlined in the accompanying statement of operating procedures.

Signed: Mugnidating

**Attachment: Accompanying Statement of Operating Procedures** 

Per the FCC CPNI rules [47 CFR §64.2009(e)] and as referenced in the attached signed certification, BTC, Inc., herein referenced as the Company hereby certifies that the Company [and its affiliates] is in compliance with the FCC CPNI rules and has outlined some of the important operating procedures below in order to ensure the Company's compliance in the protection of CPNI:

- 1. CPNI file has been updated in order to account for all FCC CPNI rules, including the recent revisions, and has been adopted by our Company.
- 2. CPNI Compliance officer has been designated to oversee all CPNI duties, training, and activity
  - Established an outbound marketing supervisory review process for the use of CPNI
  - b. Records are maintained for any marketing campaigns that utilize customers' CPNI for a minimum of one year
- 3. Employees have been trained on when they are, and are not, authorized to use or disclose CPNI
  - a. Disciplinary process has been defined and is in place for violations and/or breaches of CPNI
- 4. Carrier authentication requirements have been met
  - a. All customer during a customer-initiated telephone call are authenticated as being an authorized account contact before discussing CPNI (non-call detail)
  - b. Call detail is only released to customers during customer-initiated telephone contact only by the following FCC approved methods for the requested call detail: BTC, Inc. does not use password method.
    - Sending the requested detail to the address of record (only a physical or email address associated with that particular account that has been in our company files for at least 30 days)
    - ii. Calling the customer back at the telephone of record (only disclosing if the customer was authenticated as being an authorized account contact)
    - iii. Having customer come in to Company's office and provide a valid government issued photo ID
- 5. Notice to customer of account change as customers are notified immediately when a customer creates or changes one of the following:
  - a. authorized user
  - b. address of record
  - c. customer response to a back-up means of authentication
- Notice of unauthorized disclosure of CPNI, a notification process is in place in order to notify both law enforcement and customer(s) in the event of a CPNI breach within the timeline specified by the FCC
- 7. Opt-out method for approval of CPNI use for marketing campaigns is utilized
  - a. Customers are notified annually of their rights for the use of their CPNI in marketing campaigns
  - b. New customers are notified of the opt-out procedure as a part of the customer sign-up process
  - c. Billing system displays customer's opting status
  - d. Compliance officer retains CPNI notifications and opting records for at least two years
- 8. Additional protection measures are taken above and beyond the current FCC CPNI rules
  - a. Company takes reasonable measures to discover and protect against activity that is indicative of pretexting
  - b. Company maintains security of all CPNI, including but not limited to:
    - i. Documents containing CPNI are shredded



## BTC, Inc. d/b/a Western Iowa Networks

Policy and Procedures Governing Customer Proprietary Network Information

# Introduction Statement of Company Policy-

Under applicable federal and state laws, BTC, Inc. d/b/a Western Iowa Networks, (the "Company") has a duty to protect the confidentiality and proprietary information of, and relating to, customers, other telecommunication carriers, and equipment manufacturers. To ensure full compliance with these laws and regulations, including, specifically, the rules of the Federal Communications Commission governing customer proprietary network information ("CPNI"), this Manual sets forth in detail the policy and procedures of BTC, Inc., d/b/a Western Iowa Networks governing the use, disclosure, and provision of access to such proprietary information.

#### **Statement of Company Policy**

- \*\*\* Each employee of the Company is required to protect the confidentiality of Customer Proprietary Network Information (CPNI) and, shall comply with all policies and procedures set forth in this Manual.
- \*\*\* Any violation of or departure from the policies and procedures set forth in this Manual shall be reported to the Company's CPNI Compliance Officer.
- \*\*\* Any failure to comply with the policies and procedures set forth in this Manual shall result in disciplinary action including, but not limited to, suspension and/or termination of employment.



# The policies and procedures set forth in this manual apply to all Employees, Officers, and Board Members of BTC, Inc., d/b/a Western Iowa Networks.

- 1. Definition CPNI- Customer Proprietary Network Information
  - A. Includes personally identifiable information derived from a customer's relationship with a wireline or wireless telephone company. Every telecommunications carrier has the duty to protect the confidentiality of its customers' CPNI.
  - B. Information contained in the billings pertaining to telephone exchange service or telephone toll service received by a customer of a carrier. CPNI includes highly-sensitive personal information such as phone numbers called by a consumer; the frequency, duration, and timing of such calls, and any services purchased by the consumer, such as call waiting.
- 2. Account Information- Account information that is specifically connected to the customer's services relationship with the carrier, including such things as an account number or any component thereof, the telephone number associated with the account, or the bill's amount.
- 3. Address of Record- An address of record whether postal or electronic, is an address that the carrier has associated with the customer's account for at least 30 days.
- 4. Call Detail Information- Any information that pertains to the transmission of specific telephone calls, including, for outbound calls, the number called, and the time, location, or duration of any call and, for inbound calls, the number from which the call was placed, and the time, location, and duration of any call.
- 5. Telephone number of record- The telephone number associated with the underlying service, not the telephone number supplied as a customer's "contact information"
- 6. Valid Photo ID- A valid photo id is government- issued means of personal identification with photograph such as drivers license, passport, or comparable ID that is not expired.



#### Confidentiality of CPNI

- 1. The company may only use, disclose, or permit access to individually identifiable CPNI.
  - a. as required by law
  - b. with the approval of the customer; or
  - c. in providing the telecommunication service from which the CPNI is derived or in providing services necessary to, or used in, providing such telecommunications service.
- 2. Disclosure upon Request by customers. The company shall disclose CPNI, upon affirmative written request by the customer, to any person designated by the customer.

#### Conduct Expressly prohibited by the Company

- 1. The following are expressly prohibited by the Company:
  - a. Sale or possession of CPNI
  - b. Use of CPNI to track customers' use of competitors' services'
- 2. Any violation of this section shall be grounds for immediate termination of employment and, as applicable, referral to federal and/or state law enforcement authorities for further action. The Company may, however, in its discretion take alternative disciplinary action against any employee, officer, or board member of the Company found to have violated this section.

#### Permitted uses and Disclosures of CPNI

- 1. The company may use CPNI obtained from its customers, either directly or indirectly through its agents.
  - a. To initiate, render, bill and collect for telecommunications services.
  - b. To provide marketing, in compliance with FCC guidelines
  - c. To protect the rights or property of the Company, or to protect users and other carriers from fraudulent or illegal use of or subscription to, such services.
  - d. For provision of information services
  - e. In its provision of maintenance and repair services



#### **Company Policies and Procedures**

- 1. Unauthorized Use of CNPI- The Company regards any unauthorized or improper use, disclosure or access to CPNI as a serious offense, and will take appropriate disciplinary action, which may include suspension and/or termination of employment.
- 2. Customer Request for CPNI
  - a. CPNI may be disclosed only to the customer or a third party designated by the customer to receive the customer's CPNI. The Company requires all employees to ensure that the person requesting CPNI is authorized to receive such CPNI. The Company requires authentication of a customer's identification prior to the release of CPNI on customer initiated telephone contacts or in-store visit.
  - b. The Company will disclose call detail on a customer initiated call only by sending the call detail to an address of record, calling the customer at the telephone or record, or if customer brings in a valid ID into one of our locations.
  - c. If the customer is able to provide call detail information to the Company's employee during a customer-initiated call without the Company employee's assistance then the employee is permitted to discuss the call detail information provided by the customer.
  - d. The Company will disclose non-call detail CPNI on a customer-initiated call if the customer provides identity authentication. Identity authentication may include last four of social security number, address, and telephone number.
- 3. Notice to Customers of Account Change- The Company will notify the customer immediately when the following are created or changes (1) back up or forgotten passwords (2) the address of record (3) adding additional users to account.
- 4. Records of Disclosure of CPNI- The Company shall maintain a record of its own or any affiliates sales and marketing campaigns (if any) that use their customer's CPNI. The Company's Sales and Marketing Manager is responsible for maintaining this record, which shall include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign. This record shall be kept for a minimum of one year.



- 5. Duty to report violation or departure from CPNI Policies and Procedures Manual- Each employee, officer, or board member of the Company has an affirmative duty to ensure compliance by the Company of the requirements under federal and state law governing the use of CPNI. Any employee, officer, or board member of the Company who knows of or has reason to believe that a violation of or departure from the policies and procedures set forth in this Manual has occurred or will occur shall immediately notify your immediate Manager, Executive Officers, or CEO, or any member of the Board of Directors if the CEO is the subject of the suspected violation.
- 6. Notice to Law Enforcement of Unauthorized Disclosure of CPNI- The Company must notify law enforcement of a breach of its customer's CPNI no later than seven business days after a reasonable determination of a breach by sending electronic notification through a central reporting facility to the United States Secret Service (USSS) and the Federal Bureau of Investigation. The Company will not notify customers or disclose the breach to the public until 7 full days have passed after the notification to the USSS and the FBI except as provided in FCC guidelines. The Company will maintain a record of breaches discovered, notifications made to the USSS and the FBI and notifications made to customers. The record will include, if available, dates of discovery and notification, a detailed description of the CPNI that was the subject of the breach and the circumstances of the breach. The record must be retained for 2 years.
- 7. Employee annual certification/training-All employees of the Company shall be given a copy of this Manual. All employees are required annually to review the manual and to certify in writing that he or she understands and will adhere to the policies and procedures in this manual.
- 8. Annual Certificate of Compliance- The Company's Officer of Compliance shall annually sign a CPNI compliance certificate stating that the officer has personal knowledge that the Company has established policies and procedures that are adequate to ensure compliance with the FCC's CPNI rules.



## Customer Proprietary Network Information (CPNI) Rules and Training

#### Employee Acknowledgement:

I understand that if BTC, Inc. determines that I have violated the CPNI rules, I may be subject to disciplinary action up to and including termination of employment. I understand and agree to comply with the CPNI rules in all respects, and I will contact my Department Manager if I have questions regarding these rules.

I acknowledge that I have received CPNI training and received a copy of the manual on BTC, Inc.'s Policies and Procedures Governing Customer Proprietary Network Information ("Manual"). I understand the content of the training and the manual. I understand and agree to comply with all aspects of the training and manual, and I will contact my Department Manager if I have questions regarding the training or the manual.

Employee Signature	Date	<del></del>
		! !
Printed Name of Employee		-

#### Training CPNI 2008:

1. March 26<sup>th</sup>, 2008- A staff meeting was held and we had our annual CPNI training, Compliance Officer, Megan Badding handed out our CPNI manuals and trained staff our company's policies and procedures governing CPNI. Staff was given an acknowledgement that they were trained and fully understands CPNI. These forms are to be turned back into our HR department and kept on file.

#### Notification to our Customers 2008-

1. February 2008- Opt out notifications were sent to all our customers. We put our 800 number and an email address if customers wanted to opt out. If we are notified that a customer would like to opt out we will set an alert in our operating system. When CSR pulls that customer's account up an alert will pop up stating "Do Not Market" Insert attached.

#### **Customer Proprietary Network Information**

Special Notice Regarding Your Account Information

Breda Telephone Corp. and subsidiaries d/b/a Western Iowa Networks (WIN) knows the importance of personal privacy to our customers. WIN keeps all account information strictly confidential to the fullest extent possible and uses industry-accepted technology to safeguard customer data. Recent changes in federal law concerning telecommunications companies regulate the use of account information to selectively market specific products and services to specific customers.

To what kind of information are we referring?

This information, legally referred to as Customer Proprletary Network Information (CPNI) includes data such as which long distance carrier you have chosen, what calling features you use and which calling plans, if any, to which you may be subscribed.

Who uses this information and is it protected?

Only WIN can see or use this information. It is never released to outside companies. You have the right, and we have the duty under federal law, to protect the confidentiality of this type of information.

#### What do I need to do?

No action on your part is necessary unless you wish to restrict WIN's use of this type of information to contact you for the purpose of tailoring our service offerings to your individual needs. Should you wish to restrict use of your CPNI, please call us at 888-508-2946 or send an e-mail to cpnidata@westianet.com with your request within 30 days of receipt of this notice. Restricting CPNI may make you ineligible to receive information from WIN about new products and services, promotions and packaged offerings.

#### How does this affect services I receive?

Whatever you decide will not affect the provision of any services to which you subscribe. Your approval or denial for use of CPNI will remain valid until you tell us otherwise. Again, we only use your account information to market other telecommunications services and products the company offers and no action is required on your part unless you wish to restrict our use of your CPNI. You will still receive monthly bill inserts, quarterly newsletters and other publications that are sent to all customers at the same time, so that you are kept up to date on what is happening in the company.

We look forward to being able to serve your telecom needs more efficiently with new and existing products and services based on the information we know about your account.



1-888-508-2946 One Company. Local Choice. Local Service.



### **CPNI** Certification Memo

Date: March 1st, 2008

To: Megan Badding

From: Denise Webber

**RE:** WINwireless

i hereby certify the attached targeted marketing pieces:

	Bill Insert
x	Direct Mail Piece
	eMail Message

Bill Message
Suggestive Marketing Message
Other:

from Western Iowa Networks and/or one of its subsidiary companies is in compliance with The Federal Communications Commission (FCC) Order 07-22. No use of customer CPNI was used without the customer's approval.

Megan Badding

Western Iowa Networks CPNI Compliance Officer

WINwireless March 2008 Direct Mail



Finally high speed Internet is now available to our dial-up customers. No modems, no equiment to rent or purchase, no more waiting!

up to 1MB......\$69.99/mo Standard Installation....\$99

Get it today!

1,888-508-2946

www.wosilanet.com

#### Internet Terms and Conditions

Interriet Terms and Conditions

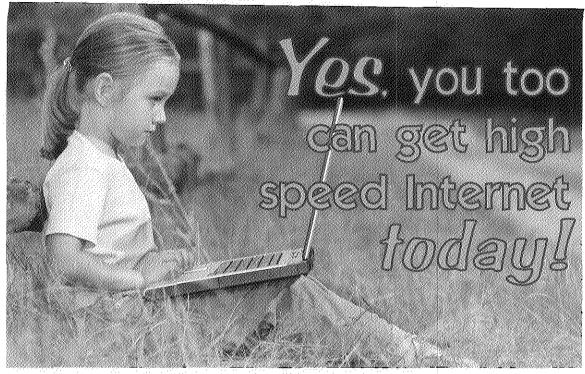
Whydreles is available in finited ristal areas. Connection to this service and speeds by to IMB are not gustatured and now vary depending on your houston. Distance from our tower and large objects such as other buildings and trees tower be factore in determining your depithility. I I month contract in required with the first month and over of installation due at time of prinches. Similarla meditation through the state of prinches and the meditation includes all necessary appropriate for a basic install. Any installation requiring additional miterial or additional distance location will be targed accordingly. Why Nevices impossible to the propriate of the principal contraction of the propriate of the principal distance for state regulations to expressly obsidely. Tempostypions include, but are not limited to, material princeted by read-over, mixed alphyed determining in moning and correspondent material.

WIN receives no control over the contents of information passing through its spacens. Additionally, no contraction of approximal value of the proposition of the accountry, quality, or outsibility of information obstance for my damages. WIN specifically denies may expended lifty for the accountry, quality, or outsibility of information obstance through its services.

Western Iowa Networks. 603 N Adams Carroll, IA 51401

> Breda Office hours: Mon-Fri 8am-5pm Carroll Office hours: Mon-Fri 8am-6pm, Sat 10am-2pm

#### WINwireless June 2008 Direct Mail



## Affordable high speed Internet is now available in your area.

up to 1NB.....\$69.29/mo Standard Installation....599

## Get it today!

1-888-508-2946 www.westlanet.com

#### Internet Terms and Conditions

Internet Terms and Conditions
Wholistes is evaluate in limited rural were. Connection to this
service and speeds up to TMB are not guaranteed and may vary
depending on your location. Distance from our tower and tirge objects
in this archer buildings and trees may be factors in determining your
eligibility. A I 2-month contract is required with the first months and cost
orinucalization de at time of practicals. Stunden and attitudes 150 of Carte
included calls, bear mouraing threats and in this sunge projector. Any
installation requiring additional material or additional distance keerion will be the
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## Western Iowa Networks

603 N Adams St Carroll, IA 51401

WINwireless	Direct Mail	List Sample
Nam e		Address

WINwireless Direct Ma	il List Sample	j		
N m e	Address	City	S t	Zlp
Dennis Holmes	1346 390th St	Auburn	IA.	51433
Larry Skinner	1391 380th St	Auburn	1A	51433
Kenneth Steinkamp	1405 400th St	Auburn	IA	51433
Doug Wurr	1416 380th St	Auburn	IA	51433
Henry Otto	1460 380 St	Auburn	۱A	51433
C lint Kanne	1465 400th St	Auburn	IA	51433
Richard Wurr	1475 380th St	Auburn	1A	51433
Harold Janssen	1476 370th St	Auburn	IA	51433
Rick Brockman	1495 380th St	Auburn	IA	51433
Dave Pudenz	1507 390th St	Auburn	IA	51433
Dennis Aispach	1511 400th St	Auburn	IA	51433
Rick Sievers	1512 390th St	Auburn	IA	51433
Kenneth Knobbe	23376 100th St	Auburn	IA	51433
Jerry Nieland Jack Hensel	3516 380th St 3615 380th St	Auburn	IA	51433 51433
John Hensel	3621 380th St	Auburn : Auburn :	AI AI	51433
Linus Pudenz	3681 400th St	Auburn	ΙA	51433
Sean Jergen	3708 Dakota Ave	Auburn	ΪÂ	51433
Norman Wernlmont	3744 Durant Ave	Auburn	IA	51433
Jeff Zim merman	3761 Fletcher Ave	Auburn	1A	51433
Current Resident	3765 Yankee Ave	Auburn	ΪÀ	51433
Current Resident	3768 Dakota Ave	Auburn	lA	51433
ClintSigmon	3794 Fletcher Ave	Auburn	. IA	51433
Terry Finley	3811 Fletcher Ave	Auburn	IA	51433
A riin Sigm on	3825 Xavier Ave	Auburn	IA	51433
Eric Steinkam p	3830 Xavier Ave	Auburn	1 <b>A</b>	51433
Scott Jacobs	3834 Dakota Ave	Auburn	1A	51433
Mike Noite	3875 Yankee Ave	Auburn	IA	51433
Randy Nieland	3585 Xavler Ave	Auburn	IA,	51433
Keith Pudenz	3908 Xavier Ave	Auburn	. IA	51433
J Pudenz	3930 Yankee Ave	Auburn	IA	51433
Melvin Pudenz	3974 Dakota Ave	Auburn	IA	51433 51433
Cletus Pudenz	3980 Dakota Ave 3991 Yankee Ave	Auburn Auburn	IA. IA	51433
David Tiefenthaler Daniel Hermsen	15598 Ivy Ave	Breda	IA	51436
David Lemmon	18091 160th St	Breda	IA.	51436
Charles White	10176 Mohagany Ave	Carroll	ΪÂ	51449
Don Ihrke	10356 Phoenix Ave	Carroll	IA.	51401
Kevin G . Hoffman	10608 Olympic Ave	Carroll	IA	51401
Paul Grote	12768 Kittyhawk Ave	Carroli	IA	51401
Jason Clausen	12857 Kittyhawk Ave	Carroll	1A	51401
Greg Pudenz	12892 Highway 71	C a rroll	l A	51401
Leon Hermsen	13286 Kitiyhawk Ave	C a rroll	IA	51401
David Teske	13425 Kittyhawk Ave	Carroll	IA	51401
David Baum hover	13556 Mahogany Ave	Carroll	1A	51401
Tony Potthoff	13598 Highway 71	Carroll	IA	51401
Bryan Becker	13673 Noble Ave	Carroll	IA IA	51401
Tom Nees Current Resident	13883 Highway 71 13886 Jewel Ave	Carroll	AI AI	51401 51401
Alan Brinks	13904 Jawel Ave	Carroll Carroll	IA	51401
Current Resident	13934 Jewel Ave	Carroli	i i	51401
Berger Residence	13941 Juniper Ave	Carroli	IA	51401
Current Resident	13946 Juniper Ave	Carroll	ÍΑ	51401
Kenny Heugerich	13950 Juniper Ave	Carroll	IA	51401
Tigges Residence	13952 Jewel Ave	C a rro II	IA	51401
Kenny Vonnahme	13962 Juniper Ave	Carroll	1A	51401
Current Resident	13968 Jewel Ave	C a rro li	IA	51401
Snyder Residence	14009 Jewel Ave	Carroli	i ia	51401
Scott Quandt	14013 Center St	C a rro II	] IA	51401
Jeff Lee	14026 Mt, Carmel Ave	C a rro li	I A	51401
Current Resident	14032 Mt. Carmel Ave	Carroli	1A	51401
Bruce Ridder	14041 Center St	Carroll	IA.	51401
Current Resident	14054 Center St	Carroll	I IA	51401
Michael Loew	14058 Mt. Carmel Ave	Carroll	IA	51401
Current Resident Current Resident	14066 Center St 14067 Jewel Ave	C a rroll C a rroll	IA IA	51401 51401
Jam le Nieland	14067 Jewer Ave	Carroll	IA	51401
Gary Schmitz	14069 Center St	Carroll	iΑ	51401
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## **CPNI** Certification Memo

Date: November 1<sup>st</sup>, 2008

To: Megan Badding

From: Denise Webber

RE: dial-up to high speed Internet

I hereby certify the attached targeted marketing pieces:

	Bill Insert
x	Direct Mail Piece
	eMail Message

Bill Message	
Suggestive Market	ing Message
Other:	,

from Western Iowa Networks and/or one of its subsidiary companies is in compliance with The Federal Communications Commission (FCC) Order 07-22 No use of customer CPNI was used without the customer's approval.

Megan Badding

Western Iowa Networks CPNI Compliance Officer

WINspeed November 2008 Direct Mail - Carroll Dial-up Residents



Isn't it time you switched from dialup to high speed DSL Internet?

DSL makes it easy to shop online, share holiday photos and videos and visit all your favorite holiday web sites.

Check out these new speeds available in Carroll!

1MB.....\$29.99/mo 3MB.....\$39.99/mo 5MB.....\$49.99/mo



Wildspeed Dal, Internet requires WIN's telephone service, a \$50 installation fee, 12 month contract and the option of leaving or purchasing a modem. Rates and speed may vary depending upon location. Not all bericles are avoidable in all service serva Advertised pricing is far residential only. Concellation of contract will result in back billing of regular, applicable charges including any installation costs that may have

Western Lova Vetworks

Visit us at www.westianet.com or call 712-775-2946 Todayl

WINspeed November 2008 Direct Mail - Other Dial-up Residents



#### Isn't it time you switched from dialup to high speed DSL Internet?

A Viestem Iowa Venyarks

DSL makes it easy to shop online, share holiday photos and videos and visit all your favorite holiday web sites.

High speed Internet only \$8 more than dial-up!

256k....\$29.<sup>99</sup>/mo



WiMpood DSI. Internet requires WiN's telephone service, a 546 installation fee, 12 month contract and the option of leasting a product hading a modern. Rater and speed undy vary depending inposition for all services are available in all service areas Advertised pricings for residential only. Consolition of contract with result in substitution of contract with result in substitution of contract with result in substitution of contract and its result in substitution of contract and its result in substitution of contract and its result in substitution is contracted in the substitution of contract and its result in substitution is contracted in the substitution of contract and its result in the substitution of contract and its result in the substitution of contraction of the substitution of contraction of the substitution of the substitution of contraction of contracti

Visit us at www.westlanet.com or call 712-775-2946 Today!

